

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

GREENLEAF COMPASSIONATE CARE
CENTER, INC.,
Plaintiff,

v.

MATTHEW SANTACROCE, in his official
capacity as Deputy Director of the Rhode
Island Department of Business Regulation;
ERICA FERRELLI, in her official capacity as
Chief of the Office of Cannabis Regulation
within the Rhode Island Department of
Business Regulation; KIMBERLY AHERN,
in her official capacity as Chair of the Rhode
Island Cannabis Control Commission;
ROBERT JACQUARD, in his official capacity
as Commissioner on the Rhode Island Cannabis
Control Commission; OLAYIWOLA
ODUYINGBO, in his official capacity as
Commissioner on the Rhode Island Cannabis
Control Commission; and LOCAL 328 OF THE
UNITED FOOD AND COMMERCIAL
WORKERS UNION,
Defendants.

C.A. No. 23-cv-282

**ASSENTED TO MOTION FOR SECOND EXTENSION OF TIME FOR STATE
DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**

NOW COME, the Defendants, Matthew Santacroce, in his official capacity as Deputy Director of the Rhode Island Department of Business Regulation; Erica Ferrelli, in her official capacity as Chief of the Office of Cannabis Regulation within the Rhode Island Department of Business Regulation; Kimberly Ahern, in her official capacity as Chair of the Rhode Island Cannabis Control Commission; Robert Jacquard, in his official capacity as Commissioner on the Rhode Island Cannabis Control Commission; Olayiwola Oduyingbo, in his official capacity as Commissioner on the Rhode Island Cannabis Control Commission (hereinafter "State

Defendants”), and hereby move this Honorable Court to extend until September 21, 2023 the time in which State Defendants have to respond to Plaintiff’s Complaint, ECF 1. This is the State Defendants second such Motion to Extend Time in this case. Counsel for the Plaintiff and Defendant Local 328 have assented to this Motion.

Respectfully Submitted,

Matthew Santacroce, in his official capacity as Deputy Director of the Rhode Island Department of Business Regulation; Erica Ferrelli, in her official capacity as Chief of the Office of Cannabis Regulation within the Rhode Island Department of Business Regulation; Kimberly Ahern, in her official capacity as Chair of the Rhode Island Cannabis Control Commission; Robert Jacquard, in his official capacity as Commissioner on the Rhode Island Cannabis Control Commission; Olayiwola Oduyingbo, in his official capacity as Commissioner on the Rhode Island Cannabis Control Commission

State Defendants,

BY:

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Chrisanne Wyrzykowski
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on September 7, 2023, I filed and served the herein document through the electronic filing system on the attorneys of record. The herein document electronically filed and served is available for viewing and/or downloading from the ECF Filing System.

/s/ Chelsea Baittinger